

Attachment B – SAMHSA’s Response to the Comments

Commenters	Comments Summary	SAMHSA's Response
The Hawaii Disability Rights Center (HDRC)– the Executive Director	HDRC requested that SAMHSA not adopt the current ACL/AIDD/annual performance model. DD/ACL. HDRC acknowledged that the current PAIMI Program Performance Report (PPR) format has some issues; however, the AIDD Protection and Advocacy of Developmental Disabilities (PADD) PPR was format was described as burdensome, difficult to complete, had convoluted reporting requirements, and requirements convoluted. The PADD PPR inaccurately reflected the significant work that HDRC did with its federal funding. HDRC concluded that the AIDD PPR reporting system needed substantial improvements and urged SAMHSA to avoid using the AIDD PADD PPR model until substantial improvements are made.	<p>SAMHSA has reviewed the each of the comments received. The current PAIMI PPR will expire on September 30, 2017 [OMB Approval 0930- 0169, Expiration date: September 30, 2017].</p> <p>In FY 2017, SAMHSA will begin the PAIMI PPR revision process. The comments submitted in response to the extension of the PAIMI Rules will be retained and reviewed during the revision process.</p> <p>A new federal register notice will be issued to solicit comments on SAMHSA's proposed PAIMI PPR that include a section to be completed by the PAIMI Advisory Council.</p>
disAbility Law Center of Virginia (dLCV) – the Executive Director	The dLCV also acknowledged that the current PAIMI PPR had issues, but did not support the suggestion by the National Disability Rights Network (NDRN) that the PAIMI PPR will be improved if modeled on the current AIDD PADD PPR. dLCV also found that the AIDD PPR was more difficult to complete and its design did not accurately reflect the dLCV's significant work with its PADD funding. Until NDRN improves the revised PADD PPR, SAMHSA is urged not to use it as a model for the PAIMI Program PPR.	
Disability Rights Washington (DR-WA)– the Executive Director (ED)	DRW submitted two separate comments: 1) a letter – The DRQ ED is the PAIMI Program Coordinator and former Chair of the NDRN Outcomes Committee and a member of the AIDD steering committee that advised on the AIDD's current PPR. He recommends that SAMHSA engage NDRN and cover the costs to create the necessary infrastructure (database, computer generated reports and reporting platform) for the new PAIMI PPR based on the one currently used by the AIDD PADD Program. The 57 P&A systems that are members of NDRN also unanimously endorsed a Model PPR format. The model format will be used to facilitate the reporting requirements of the various federal P&A programs administered by HHS, the Department of Education/Rehabilitation Services Administration (RSA) and Social Security Administration (SSA) into one document and ease the P&A grantees' annual PPR burdens. 2) An email included an additional comment. The ED added wanted additional language added to revise the statutory requirements of the PAIMI Act at 42 USC 10824 (a) and cited in 81 Fed. Reg. 19611.	
The National Disability Rights Network (NDRN) – Executive Director	NDRN represents the 57 state protection and advocacy (P&A) systems and supports the extension of the PAIMI Rules. NDRN wants to standardize the PPR reports to ease the burden of its members who must submit an annual PPR for each of their federal P&A grants (around 7). NDRN wants SAMHSA to use the AIDD PPR as the model for any revisions to the PAIMI PPR, include NDRN and the P&A systems in the development processes, and financially support the upkeep and maintenance of the electronic data base for collecting the P&A program PPR.	